

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ALT PLATFORM, INC., as the General  
Partner of Alt Sports Card Fund, L.P.,

Plaintiff,

v.

BECKETT COLLECTIBLES, LLC,

Defendant.

No. 3:22-cv-02867-N

**BECKETT COLLECTIBLES, LLC'S MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 8(a), 12(b)(1), and 12(b)(6), Defendant Beckett Collectibles, LLC ("Beckett") files this Motion to Dismiss Plaintiff's Complaint with prejudice. (*See* Compl., at ECF 1.) Because Plaintiff lacks constitutional standing, the Court does not have subject matter jurisdiction to hear this case. Additionally, Plaintiff's Complaint fails to state a plausible claim for relief. For the reasons set forth in Beckett's Brief in Support of Motion to Dismiss, filed contemporaneously herewith, the Court should dismiss Plaintiff's Complaint with prejudice because its defects cannot be cured.

Dated: February 20, 2023

Respectfully submitted,

CONDON TOBIN SLADEK THORNTON  
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/s/ Aaron Z. Tobin

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2023, the foregoing was electronically submitted to the clerk of court for the United States District Court for the Northern District of Texas using the Court's electronic filing system and that all counsel of record have been served electronically or as authorized by the Federal Rules of Civil Procedure.

/s/ Aaron Z. Tobin  
Aaron Z. Tobin